

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: DEALER MANAGEMENT SYSTEMS)	MDL No. 2817
ANTITRUST LITIGATION)	Case No. 1:18-CV-00864
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<i>This Document Relates To:</i>)	
)	Hon. Robert M. Dow, Jr.
i3 Brands, Inc. et al. v. CDK Global, LLC,)	
et al., No. 1:19-CV-01412)	

STIPULATION AS TO ANSWER DATE AND PAGE LIMITS

Plaintiffs i3 Brands, Inc. and PartProtection, LLC and Defendants CDK Global, LLC, and The Reynolds and Reynolds Company, by and through their undersigned counsel, jointly submit this Stipulation and Proposed Order with regard to (1) the date by which Defendants must answer or otherwise plead; and (2) the page limits for the parties' respective briefs regarding Defendant's forthcoming Motions to Dismiss.¹

WHEREAS, this case was originally filed in the Southern District of California before the Judicial Panel on Multidistrict Litigation transferred it to this District for coordinated or consolidated pretrial proceedings.

WHEREAS, the District Court for the Southern District of California stayed the action pending the JPML's final order on transfer and ordered that Defendants would answer or otherwise plead within 30 days of the date of the JPML's final order on transfer, or as otherwise ordered by the MDL Court.

¹ Reynolds fully reserves its arbitration rights and intends to assert them in this matter. This Stipulation is filed subject to and without waiver of those rights.

WHEREAS, under the District Court for the Southern District of California's order, Defendants are to answer or otherwise plead on March 29, 2019.

WHEREAS, the parties have since met and conferred regarding Defendants' deadline to answer or otherwise plead as well as the page limits for Defendants' forthcoming Motions to Dismiss and related briefing.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs i3 Brands, Inc. and PartProtection, and Defendants CDK Global, LLC and The Reynolds and Reynolds Company, that:

1. Defendants' deadline to answer or otherwise plead shall be April 1, 2019.
2. Page limits for the forthcoming Motions to Dismiss shall be as follows:
 - a. Defendants may each file a brief of up to 30 pages in support of their respective Motions to Dismiss;
 - b. Plaintiffs may file a response brief of up to 30 pages in opposition to each Defendant's motion (or one consolidated brief of up to 60 pages);
 - c. Defendants may each file a reply brief of up to 15 pages.

STIPULATED AND AGREED:

/s/ J. Erik Connolly

J. Erik Connolly
Lauren C. Tortorella
BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP
333 W. Wacker Dr. Suite 1900
Chicago, IL 60606
Telephone: (312) 212-4949
Email: econnolly@beneschlaw.com
Email: ltortorella@beneschlaw.com

*Counsel for Plaintiffs i3 Brands,
Inc. and PartProtection, LLC*

/s/Aundrea K. Gulley

Aundrea K. Gulley
Kathy D. Patrick
Brian T. Ross
Brice A. Wilkinson
Ross M. MacDonald
Justin D. Patrick
GIBBS & BRUNS, LLP
1100 Louisiana St. Ste. 5300
Houston, TX 77002
(713) 650-8805
agulley@gibbsbruns.com
kpatrick@gibbsbruns.com
bross@gibbsbruns.com
bwilkinson@gibbsbruns.com
rmacdonald@gibbsbruns.com
jpatrick@gibbsbruns.com

Michael P.A. Cohen
Amar S. Naik
SHEPPARD MULLIN RICHTER
& HAMPTON, LLP
2099 Pennsylvania Ave., NW, Suite 100
Washington, DC 20006
(202) 747-1900
mcohen@sheppardmullin.com
anaik@sheppardmullin.com

*Counsel for Defendant The Reynolds &
Reynolds Company*

/s/ Britt M. Miller

Britt M. Miller
Michael A. Scodro
Matthew D. Provance
Mayer Brown LLP
71 South Wacker Drive
Chicago, IL 60606
(312) 782-0600
bmiller@mayerbrown.com
mscodro@mayerbrown.com
mprovance@mayerbrown.com

Mark W. Ryan
Mayer Brown LLP
1999 K Street NW
Washington, DC 20006
(202) 263-3000
mryan@mayerbrown.com

Counsel for Defendant CDK Global, LLC

DATED: March 18, 2019

SO ORDERED:

Hon. Robert M. Dow

CERTIFICATE OF SERVICE

I, Aundrea K. Gulley, an attorney, hereby certify that on this 18th day of March, 2019, I caused a true and correct copy of the foregoing Stipulation as to Answer Date and Page Limits to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by email to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF system.

/s/ Aundrea K. Gulley _____

Aundrea K. Gulley
GIBBS & BRUNS LLP
1100 Louisiana Street, Suite 5300
Houston, TX 77002
(713) 650-8805
agulley@gibbsbruns.com